

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA, :

Plaintiff, :

v. :

Criminal Action No. 07-*60-VNA*

DAVID HANCOCK and
MIGUEL ALCANTARA, :

Defendants. :

REDACTED

INDICTMENT

The Federal Grand Jury for the District of Delaware charges that:

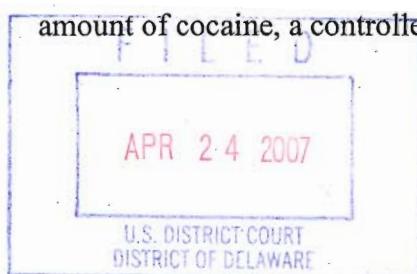
COUNT I

On or about April 11, 2007, in the State and District of Delaware, DAVID HANCOCK and MIGUEL ALCANTARA, defendants herein, did knowingly conspire together and with each other, to possess with intent to distribute five hundred (500) grams or more of a mixture and substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

All in violation of Title 21, United States Code, Section 846 and Title 18, United States Code, Section 2.

COUNT II

On or about April 11, 2007, in the State and District of Delaware, DAVID HANCOCK and MIGUEL ALCANTARA, defendants herein, did knowingly attempt to possess with intent to distribute five hundred (500) grams or more of a mixture and substance containing a detectable amount of cocaine, a controlled substance, in violation of Title 21, United States Code, Sections



841(a)(1) and (b)(1)(B) and 846, and Title 18, United States Code, Section 2.

COUNT III

On or about April 11, 2007, in the State and District of Delaware, MIGUEL ALCANTARA, defendant herein, did knowingly possess, with intent to distribute, a mixture and substance containing a detectable amount of cocaine base, a controlled substance, in violation of 21 U.S.C. § 841(a)(1) and (b)(1)(B).

COUNT IV

On or about April 11, 2007, in the State and District of Delaware, MIGUEL ALCANTARA, defendant herein, did knowingly possess marijuana, a controlled substance, in violation of 21 U.S.C. § 844.

NOTICE OF FORFEITURE

Upon conviction of one or more of the controlled substance offenses alleged in Counts I-II above, DAVID HANCOCK and MIGUEL ALCANTARA, defendants herein, shall forfeit to the United States pursuant to 21 U.S.C. § 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of the said violations and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the said violations, including but not limited to:

\$25,370.00 in United States Currency; and

\$1,100.00 in United States Currency.

If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (1) cannot be located upon the exercise of due diligence;

- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the forfeitable property described above.

A TRUE BILL:

Foreperson

COLM F. CONNOLLY
United States Attorney

By: Douglas E. McCann
Douglas E. McCann
Assistant United States Attorney

Date: April 24, 2007